



Connecticut Department of Public Health

Testimony Presented Before the Education Committee

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**Commissioner Manisha Juthani, MD
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Senate Bill 1198, An Act Implementing the Recommendations of the School Indoor Air Quality Working Group

The Department of Public Health (DPH) provides the following information about Senate Bill 1198, which requires DPH to adopt regulations to establish an optimal thermal comfort range of for school buildings and facilities. Thank you for the opportunity to testify on this issue.

DPH supports the bill's intent to ensure that temperatures are maintained at a comfortable level that fosters a favorable environment for teaching and learning. However, the bill presents significant technical, programmatic, and implementation challenges that will make it difficult to achieve the intended goal.

The bill directs DPH to establish an optimal thermal comfort range of sixty-five to eighty degrees for school buildings but does not address compliance or enforcement of the temperature range. There would be an unbudgeted fiscal impact to DPH associated with developing the corresponding regulations, as the Department does not have the necessary expertise on staff to complete this work. Also, thermal discomfort cannot always be directly linked to public health effects. This would make any enforcement, like school evacuation, from a public health standpoint very difficult. If DPH is responsible for compliance and enforcement, this will have a significant and currently unbudgeted fiscal impact.

In addition, the bill allows DPH to adopt a larger optimal thermal comfort range for gymnasiums and natatoriums; however, the bill lacks guidance on how DPH might determine such a range.

Finally, thermal comfort is more complicated than simply temperature. Some individuals are more sensitive to heat and cold and may experience discomfort at temperatures within the range required by the bill. As discussed in the ASHRAE Standard 55-2020-Thermal Environmental Conditions for Human Occupancy, there are a variety of factors in addition to indoor air temperature that impact thermal comfort. These include humidity, movement of air, thermal radiation, activity level of occupants, and clothing. Guidance for schools that incorporates all the

factors impacting thermal comfort is a better mechanism to achieve the bill's goal than a regulatory temperature range.

Thank you for your consideration of this information. DPH encourages committee members to reach out with any questions.